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IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA	)	
	)	CR. NO. S-99-433-WBS
Plaintiff,	)	
	)	
v.	)	STIPULATION AND [ <del>PROPOSED</del> ] ORDER
	)	TO JOIN DEFENDANTS AND TO CONTINUE
THONGSOUK THENG LATTANAPHON,	)	JURY TRIAL ON COUNTS SIX, SEVEN,
aka Kevin Lattanaphon,	)	EIGHT, AND NINE
	)	
Defendant.	)	DATE: April 17, 2007
	)	TIME: 9:00 a.m.
	)	CTRM: Honorable William B. Shubb

The United States of America, through its counsels of record, McGregor W. Scott, United States Attorney for the Eastern District of California, and William S. Wong and Jason Hitt, Assistant United States Attorneys; defendant Thongsouk Theng Lattanaphon, through his counsel of record, Jeffrey Staniels, Assistant Federal Defender; hereby stipulate and agree that the jury trial of Counts Six, Seven, Eight, and Nine in the above-entitled matter - Indictment number CR.S-99-0433-WBS, which is presently set for trial on April 17, 2007, should be continued to October 7, 2007, at 9:00 a.m.

The parties agree that by continuing these counts to the October date, the policy of judicial economy will be furthered, and

1 victims and witnesses in those robberies will be called to testify  
2 in one, rather than two trials.

3 The parties agree and stipulate that defendant Lattanaphon  
4 should be joined with co-defendants John That Luong, Minh Huynh,  
5 Hoang Ai Le, and Son Van Nguyen for trial on Counts Six, Seven,  
6 Eight, and Nine, presently set for jury trial on October 2, 2007.  
7 The parties further stipulate that if the defendant is joined with  
8 the co-defendants for trial for the aforementioned counts, on the  
9 aforementioned date, that time be excluded from the Speedy Trial  
10 clock pursuant to 18 U.S.C. § 3161(h)(7) - delay when the defendant  
11 is joined for trial with co-defendants. The parties agree that the  
12 period of time between April 17, 2007 and October 2, 2007 should be  
13 excluded from the Speedy Trial clock in order to allow defense  
14 counsel time to effectively prepare for the trial of Counts Six,  
15 Seven, Eight, and Nine pursuant to 18 U.S.C. § 3161(h)(8)(B)(iv) and  
16 Local Code T4 - to allow reasonable time to prepare.

17 Respectfully submitted,

18 MCGREGOR W. SCOTT  
19 United States Attorney

20 DATED: April 4, 2007

21 By: /s/ WILLIAM S. WONG  
22 WILLIAM S. WONG  
23 Assistant U.S. Attorney

24 DATED: April 4, 2007

25 By: /s/ JEFFREY STANIELS  
26 JEFFREY STANIELS  
27 Assistant Federal Defender for  
28 defendant THONGSOUK THENG  
LATTANAPHON

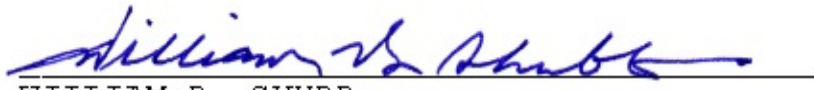
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ORDER

For the foregoing reasons, the Court orders that defendant Thongsouk Theng Lattanaphon be joined with co-defendants John That Luong, Minh Huynh, Hoang Ai Le, and Son Van Nguyen as to Counts Six, Seven, Eight, and Nine for trial on October 2, 2007. The Court further orders that the trial of those counts, presently set for April 17, 2007, be continued to October 2, 2007, and that time be excluded for the reasons stated above from today's date up to and including October 2, 2007.

DATED: April 9, 2007

  
WILLIAM B. SHUBB  
UNITED STATES DISTRICT JUDGE